

STIP
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UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	Case No.: 2:18-mj-00823-VCF
vs.)	
)	STIPULATION TO CONTINUE
SARAH ORR-HUGHES,)	PRELIMINARY EXAMINATION
)	
Defendant.)	(SECOND REQUEST)
_____)	

IT IS STIPULATED between the defendant SARAH ORR-HUGHES through her attorney GABRIEL L. GRASSO, ESQ., and the United States of America, through BRANDON JAROCH, Assistant United States Attorney, that the Preliminary Examination currently scheduled for November 5, 2018, at the hour of 4:00 p.m., be vacated and continued to a date and time convenient to this court but not earlier than thirty (30) days.

This Stipulation is entered into pursuant to General Order 2007-04 and based upon the following:

1. There have been one previous continuances granted to the defense in this case.
2. The parties are in Pre-Indictment plea negotiations and will require an additional 30 days to attempt to resolve this matter.
3. The defendant is on Pretrial Release and does not object to a continuance of the preliminary hearing.
4. Denial of this request for continuance would deny defense counsel sufficient time to be able to appear at the motion to withdraw, taking into account the exercise of due diligence.

5. Also, denial of this request or continuance would result in a miscarriage of justice.

6. This is the second request for a continuance of the preliminary hearing date.

DATED this 1 day of November, 2018.

RESPECTFULLY SUBMITTED BY:

/s/Brandon Jaroch
BRANDON JAROCH
Assistant United States Attorney

/s/ Gabriel L. Grasso
GABRIEL L. GRASSO
Attorney for ORR-HUGHES

BRANDON JAROCH

Assistant United States Attorney

GABRIEL L. GRASSO

Attorney for ORR-HUGHES

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FINDINGS OF FACT

Based upon the submitted Stipulation, and good cause appearing therefore, the Court finds that:

1. The parties seek additional time for pre-indictment plea negotiations.
2. The defendant does not object to a continuance of the preliminary hearing.

CONCLUSIONS OF LAW

1. Denial of this request for continuance would deny counsel the ability to explain his reasons for withdraw to the Court.
2. Additionally, denial of this request for continuance would result in a miscarriage of justice.
3. For all of the above stated reasons, the ends of justice would best be served by a continuance of the sentencing hearing date.

